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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,	)	CR 07-0454 PJH
	)	
Plaintiff,	)	GOVERNMENT'S AMENDED
	)	NOTICE OF INTENT TO OFFER OUT-
v.	)	OF-COURT STATEMENTS
	)	
SHANNON BLAYLOCK,	)	Trial Date: September 15, 2008
	)	Time: 8:30 a.m.
Defendant.	)	

The United States of America, submits the following list of co-conspirator s  
statements it intends to offer at trial, divided according to witness.

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GOVERNMENT'S AMENDED NOTICE OF INTENT TO OFFER CO-CONSPIRATORS  
STATEMENTS, CR 07-0454 PJH

**1. Declarant V.S.**

The government may offer the following statements through victim and witness V.S. The evidence will show that V.S. was 17 years of age when acting as a prostitute employed by her pimp, Shannon Blaylock, a/k/a Daddy Rich. With respect to the evidence showing that she knew about the conspiracy, through the testimony of V.S., co-defendant Seaton, Antonio Williams, and others and in documents showing, *inter alia*, travel and phone calls, the evidence will show that she knew about the conspiracy because she was the she was the object of the conspiracy and that she had dealings with and communications with both co-conspirators, Blaylock and Seaton.

STATEMENT
On or about February 19, 2007, she had conversations with defendant Seaton and the defendant Blaylock in which she (V.S.) told them that she was 17 years old and she would be eighteen years old in a few months. V.S. will testify that in response, Seaton, said that it was okay and that she could work as a receptionist, answering phone calls of clients.
Between February 24 and March 7, 2008, she had conversations with Seaton in which Seaton said that she and "Daddy Rich" had other "girls" and had previously had other minors working as prostitutes.
Between February 25 and March 7, 2007, she overheard conversations between Seaton and Blaylock concerning the on-going prostitution of V.S. and Seaton and Blaylock making arrangements for V.S. to travel to California to work with Blaylock.
V.S. is expected to testify that between February 25 and March 7, 2007, she overheard conversations between Seaton and Blaylock concerning the on-going prostitution of V.S. and Seaton and Blaylock making arrangements for V.S. to travel to California to work with Blaylock.

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**STATEMENT**

Between March 1, 2007 and March 7, 2007, she spoke to the defendant via cell phone while she was in Baton Rouge, the defendant told her that he was her “daddy” and “the main guy” in one call and in another that he would like V.S. to come out and get to know him and that he would take her to restaurants and buy her new clothes.

Between March 10 and March 22, 2007, the defendant would tell her many times, you have someone coming, and then a man would arrive at her hotel room wanting sex for money.

Between March 10 and March 22, 2007, the defendant told her that he would get her a fake identification.

Between March 10 and March 22, 2007, after she got locked out of a hotel room, the defendant took her I.D. and social security card, and told her it was not a good idea to show her I.D. because she was only 17, and people would think the wrong thing as she was 17 and he was almost 40.

Between March 10 and March 22, 2007, the defendant told her that his real name was Arlandys Richardson and she should tell the police that if she was ever asked by the police.

Between March 10 and March 22, 2007, the defendant instructed her as to when she could eat and how much money she could have.

Between March 10 and March 22, 2007, the defendant instructed her that she should not look at other men, particularly in his presence, because is showed a lack of respect for him.

Between March 10 and March 22, 2007, the defendant told her that he would not have sexual intercourse with her because she was only 17 years old but that she could orally copulate him and directed her to do so.

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**2. Declarant Co-Defendant Tawakoni Seaton**

Seaton is the co-defendant of the defendant Blaylock. She and Blaylock have a long-standing relationship dating from approximately 2001 and have worked together as prostitute and pimp since approximately December 2005. With respect to the evidence showing that she knew about and participated in the conspiracy, she has plead to the Sex Trafficking of the minor at issue this case. And, through her own testimony, the evidence will show that she worked in cooperation with and at the direction of the defendant Blaylock in arranging for and prostituting the minor, V.S.

<b><u>STATEMENT</u></b>
In December 2005 or January 2006, she advised Blaylock that she believed “Tuesday,” a prostitute working with her and Blaylock, was underage; and that in response, Blaylock said that Seaton was jealous and accused Seaton of not liking the other “girls.” <sup>1</sup>
In January 2006, she met “Pooh,” prostitute working with her and Blaylock and that Seaton asked “Pooh” about her age believing and later learning that she was a minor. <sup>2</sup>

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<sup>1</sup> Paragraph 6, second sentence, from *UNITED STATES’ NOTICE OF INTENT TO USE EVIDENCE OF OTHER CRIMES, WRONGS, AND BAD ACTS PURSUANT TO FEDERAL RULE OF EVIDENCE 404(B)*.

<sup>2</sup> Paragraph , second sentence, from *UNITED STATES’ NOTICE OF INTENT TO USE EVIDENCE OF OTHER CRIMES, WRONGS, AND BAD ACTS PURSUANT TO FEDERAL RULE OF EVIDENCE 404(B)*.

**STATEMENT**

In the second and third weeks of February 2007, when communicating with V.S. on line and via instant messenger, she told V.S. that she was an escort; that as an escort she traveled, stayed in hotels, and saw clients; and that in response to questioning by V.S., said that V.S. would have to be eighteen years old to work as an escort. Seaton is also expected to testify that on or about February 19, 2007, she made nearly identical statements during a phone conversations with V.S.

On or about February 19, 2007, she spoke to the grandmother of V.S. and told her that she was an escort; that because V.S. was not eighteen years old yet, she could answer phones; that Victoria would travel as an escort; and that Victoria could use the computer for classes because she was leaving high school.

On or about February 19, 2007, she said and she and Blaylock discussed that V.S. was only seventeen years old and would be eighteen years old in a few months.

Between February 25 and February 28, 2007, she had conversations with V.S. and discussed purchasing clothes for V.S. to use in photographs for advertisements for prostitution and during her appointments with clients.

Between February 25 and February 28, 2007, she had conversations with V.S. and discussed taking pictures of her to post on the internet for advertisements for prostitution.

Between February 24 and March 1, 2007, she had conversations with V.S. and discussed scheduling of clients for V.S.; how to act and what to do with clients; how to take money up front from clients before engaging in commercial sex acts; how to hide the money while a client was present to prevent theft from a client; and not to allow a client to stay longer than he had paid for.

**STATEMENT**

Between February 24 and March 7, 2007, she had conversations with V.S. that she (Seaton) and “Daddy Rich” had other “girls” and had previously had other minors working as prostitutes.

On or about February 22, 2007, she and Blaylock spoke about V.S. and Blaylock said to “put this thing into action.”

On or about February 26, 2007, the defendant directed her which photographs to post of V.S. in internet advertisements.

Between on or about February 26, 2007 and March 22, 2007, she and the defendant discussed how much to charge for prostitution services of V.S.

Between February 24 and March 22, 2007, the defendant directed her to wire money to him through his cousin Latosha Gardner.

Between February 24 and March 1, 2007, the defendant directed her to open a Green Dot pre-paid credit card in V.S.’s name.

Dated this 12<sup>th</sup> day of September, 2008

Respectfully submitted,

JOSEPH P. RUSSONIELLO  
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